

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 05-138</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: Feb. 19, 2009</b>
<b>GEORGE THOMAS,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a "George Thomas, EI"</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1028A (aggravated identity theft - 11 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud - 2 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 3146(a)(1) (failure to appear - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. §2 (aiding and abetting)</b>
	<b>:</b>	<b>Notice of forfeiture</b>

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**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. The following banks were financial institutions, insured by the Federal Deposit Insurance Corporation:
  - a) Citizens Bank, certificate number 57282;
  - b) Commerce Bank, certificate number 25293;
  - c) Wachovia Bank, certificate number 33869;
  - d) PNC Bank, certificate number 6384;
  - e) Univest Bank, certificate number 7759;
  - f) First Trust Bank, certificate number 26647; and
  - g) Sovereign Bank, certificate number 29950.

2. From in or about October 2003, through in or about July 2005, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**GEORGE THOMAS,  
a/k/a “George Thomas, El,”**

conspired and agreed, with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly execute, and attempt to execute, and aid and abet the execution of, a scheme to defraud Citizens Bank, Commerce Bank, Wachovia Bank, PNC Bank, Univest Bank, First Trust Bank, and Sovereign Bank, and to obtain monies owned by and under the care, custody, and control of those banks by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Sections 1344 and 2, and to knowingly and without lawful authority use a means of identification of another person during and in relation to a bank fraud scheme, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

#### **MANNER AND MEANS**

3. It was part of the conspiracy that defendant GEORGE THOMAS, a/k/a “George Thomas, El,” along with Kasimu Clark and Derrick Rooker, charged elsewhere, provided to other individuals stolen personal identifying information about true bank customers, fraudulent identifications in the name of the true bank customers, and stolen, counterfeit, and otherwise unauthorized checks, and those individuals then used the personal identifying information and fraudulent identifications to cash the stolen, counterfeit, and otherwise unauthorized checks and make unauthorized withdrawals from the true bank customers, and to attempt to do so, thereby defrauding Citizens Bank, Commerce Bank, Wachovia Bank, PNC Bank, Univest Bank, First Trust Bank, and Sovereign Bank of over one million dollars.

It was further a part of the conspiracy that:

4. Kasimu Clark recruited bank employees to provide names, addresses, dates of birth, social security numbers, account numbers, and account balances of bank customers.

5. Derrick Rooker led a team of check-cashers which included Sandra Lawson, George Taylor, James Butler, Robert Liszewski, and Kelly Bauldree, all charged elsewhere, and others known and unknown to the grand jury.

6. Defendant GEORGE THOMAS, a/k/a “George Thomas, El,” maintained a computer, printer, laminator, scanner, and other equipment at his home on South 56th Street, Philadelphia, Pennsylvania, which he used to manufacture fraudulent driver’s licenses and other forms of identification for the check-cashers to use when they went into the banks.

7. Derrick Rooker recruited Stanley Young, charged elsewhere, to rent cars and drive the check-cashers to banks to cash **stolen, counterfeit, and otherwise unauthorized checks** and make unauthorized withdrawals.

8. Per instructions from Kasimu Clark, Derrick Rooker caused pictures to be taken of all check-cashers and provided these pictures to Clark.

9. Kasimu Clark provided the pictures of the check-cashers to defendant GEORGE THOMAS, a/k/a “George Thomas, El,” who used them to create fraudulent identifications, such as Pennsylvania driver’s licenses, containing the stolen personal identifying information of true bank customers and the photos of the check-cashers.

10. Defendant GEORGE THOMAS, a/k/a “George Thomas, El,” then provided the completed fraudulent identifications to Kasimu Clark, who paid defendant THOMAS approximately \$250 to \$400 per fraudulent identification.

11. Sometimes defendant GEORGE THOMAS, a/k/a “George Thomas, El,” also provided Kasimu Clark with **stolen, counterfeit, and otherwise unauthorized checks** for the check-cashers to use, at the same time that defendant THOMAS provided Clark with the fraudulent identifications. Clark paid defendant THOMAS approximately \$50 to \$100 per **stolen, counterfeit, and otherwise unauthorized check**.

12. Kasimu Clark distributed the **stolen, counterfeit, and otherwise unauthorized checks** and the fraudulent identifications to Derrick Rooker or Stanley Young with an agreement and understanding that the check-cashers would cash or attempt to cash the checks at banks throughout the Eastern District of Pennsylvania and elsewhere by displaying the fraudulent identifications when necessary.

13. A check-casher was sometimes given more than one stolen identity to portray each day.

14. Stanley Young or another individual designated by Derrick Rooker drove the group of check-cashers to banks from which account information and customer identities had been stolen.

15. Only one check-casher went into a bank at a time.

16. The check-cashers memorized the identifying information regarding the victim bank account holder.

17. Prior to the check-casher entering the bank, Derrick Rooker placed a call to Kasimu Clark or the automated bank system of the individual bank to learn the account balance and check to see that there were no fraud alerts on the account.

18. With the means of identification provided by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” and personal and bank account information provided by

Kasimu Clark through Derrick Rooker or others, the check-casher entered the bank and pretended to be the victim bank customer in order to cash the stolen, counterfeit, and otherwise unauthorized checks at the banks and to make unauthorized withdrawals from the banks.

19. When the check-cashers successfully cashed the **stolen, counterfeit, and otherwise unauthorized checks** or made withdrawals, they returned to the car and gave the cash to Derrick Rooker, who was often in the car, or his designee.

20. The check-cashers would be driven to as many banks as necessary to cash all the checks provided.

21. At the end of a day of cashing **stolen, counterfeit, and otherwise unauthorized checks** and making unauthorized withdrawals, Derrick Rooker or his designee would collect all identifications from the check-cashers and pay them for their services.

22. The check-cashers were required to give a gratuity to the driver, whether it was Stanley Young or another individual, each day they were driven.

23. Derrick Rooker met with Kasimu Clark and gave him the cash from the **stolen, counterfeit, and otherwise unauthorized checks** cashed each day.

24. Kasimu Clark paid Derrick Rooker 10% of the net amount of the **stolen, counterfeit, and otherwise unauthorized checks** cashed.

25. Defendant GEORGE THOMAS, a/k/a "George Thomas, El," in addition to providing fraudulent identifications and **stolen, counterfeit, and otherwise unauthorized checks** to his coconspirators, also served as a check-casher and went into the banks pretending to be other people who were true bank customers, and cashed **stolen, counterfeit, and otherwise unauthorized checks** and made unauthorized withdrawals in the same manner as described above. For these

transactions, Kasimu Clark provided the true account holders' information to defendant THOMAS, defendant THOMAS made the fraudulent identifications and checks, and then Clark and defendant THOMAS split the proceeds of the fraudulent transactions 50-50.

26. By cashing the stolen, counterfeit, and otherwise unauthorized checks and making unauthorized withdrawals in other people's names, the check-cashers stole and attempted to steal the following approximate amounts from the following banks: \$583,238.12 from Citizens Bank; \$131,397.76 from Commerce Bank; \$309,862.32 from Wachovia Bank; \$119,885.60 from PNC Bank; \$51,438.98 from Uninvest Bank; \$48,000 from First Trust Bank; and \$45,991.89 from Sovereign Bank.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, defendant GEORGE THOMAS, "George Thomas, El," Kasimu Clark, Derrick Rooker, Sandra Lawson, George Taylor, James Butler, Robert Liszewski, and Kelly Bauldree committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

#### **Transactions by GEORGE THOMAS, a/k/a "George Thomas, El"**

1. From in or about October 2003, through in or about December 2003, Kasimu Clark provided defendant GEORGE THOMAS, a/k/a "George Thomas, El," with the names, addresses, dates of birth, social security numbers, account numbers, and account balances of true Citizens Bank and Sovereign Bank account holders so that defendant THOMAS could cash stolen, counterfeit, and otherwise unauthorized checks made out to those true customers and make unauthorized withdrawals from those customers' accounts.

2. From in or about October 2003, through in or about December 2003, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” made fraudulent identifications containing his own photo and the names, addresses, and dates of birth of the true bank customers whose personal identifying information was provided to him by Kasimu Clark.

3. From on or about October 3, 2003, through on or about December 11, 2003, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” presented approximately 36 stolen, counterfeit, and otherwise unauthorized checks at Citizens Bank and Sovereign Bank. When cashing these checks, defendant THOMAS pretended to be various Citizens Bank and Sovereign Bank account holders and forged their signatures on the checks.

4. Defendant GEORGE THOMAS, a/k/a “George Thomas, El,” presented the fraudulent identifications he made and the personal and bank account information he received from Kasimu Clark when he asked the bank tellers to process his transactions.

5. By cashing the stolen, counterfeit, and otherwise unauthorized checks and making the unauthorized withdrawals in other people’s names, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” stole and attempted to steal approximately \$74,632.07 from Citizens Bank and \$8,729.92 from Sovereign Bank.

6. After each fraudulent transaction, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” split the proceeds with Kasimu Clark.

#### **Transactions by George Taylor**

7. With the means of identification made by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” and provided to George Taylor by Derrick Rooker, Taylor pretended to be other people in order to cash stolen, counterfeit, and otherwise unauthorized checks and to

make unauthorized withdrawals at Citizens Bank, Commerce Bank, Wachovia Bank, and PNC Bank.

8. From on or about June 18, 2004, through on or about March 30, 2005, at the direction of Derrick Rooker, George Taylor presented approximately 70 stolen, counterfeit, and otherwise unauthorized checks and approximately 18 unauthorized withdrawal slips at Citizens Bank, Commerce Bank, Wachovia Bank, and PNC Bank. When cashing these checks and making these withdrawals, Taylor pretended to be various bank account holders and forged their signatures on the checks and withdrawal slips.

9. George Taylor presented the fraudulent identifications made by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” and personal and bank account information he received from Derrick Rooker when he asked the bank tellers to process the transactions.

10. By cashing the stolen, counterfeit, and otherwise unauthorized checks and making the unauthorized withdrawals in other people’s names, George Taylor stole and attempted to steal approximately \$256,756.82 from Citizens Bank, \$68,759.02 from Commerce Bank, \$23,378.08 from Wachovia Bank, and \$13,082.28 from PNC Bank.

11. After each fraudulent transaction, George Taylor gave the proceeds to Derrick Rooker or the individual Rooker designated.

12. In or about September 2004, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” manufactured a fraudulent Pennsylvania driver’s license that contained the photo of George Taylor and the name, address, and date of birth of true Citizens Bank customer F.M.



13. In or about September 2004, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” provided to Kasimu Clark the fraudulent Pennsylvania driver’s license he had created with George Taylor’s photo and F.M.’s personal identifying information.

14. In or about September 2004, Kasimu Clark provided to Derrick Rooker, Stanley Young, or another driver the fraudulent Pennsylvania driver’s license created by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” with George Taylor’s photo and F.M.’s personal identifying information, as well as two **stolen, counterfeit, and otherwise unauthorized checks** made out to F.M.

On or about the following dates, George Taylor went to the following Citizens Bank branches, where he cashed and attempted to cash one of the **stolen, counterfeit, and otherwise unauthorized checks** made out to F.M. and made and attempted to make unauthorized withdrawals from F.M.’s account:

Overt Act	Date	Bank Location	Face Amount of Check or Withdrawal Slip/ Counter Check
15	9/2/2004	Marlton, NJ	\$4,100.00 counter check
16	9/2/2004	Marlton, NJ	\$4,649.37 check
17	9/2/2004	Glenside, PA	\$2,500.00 counter check
18	9/3/2004	Horsham, PA	\$4,256.08 check

### **Transactions by Sandra Lawson**

19. With the means of identification made by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” and provided to Sandra Lawson by Derrick Rooker, Lawson pretended to be other people in order to cash stolen, counterfeit, and otherwise unauthorized checks and to make unauthorized withdrawals at Citizens Bank, Commerce Bank, Wachovia Bank, PNC Bank, First Trust Bank, and Sovereign Bank.

20. From on or about January 15, 2004, through on or about July 26, 2004, at the direction of Derrick Rooker, Sandra Lawson presented approximately 68 stolen, counterfeit, and otherwise unauthorized checks and approximately 58 unauthorized withdrawal slips at Citizens Bank, Commerce Bank, Wachovia Bank, PNC Bank, First Trust Bank, and Sovereign Bank. When cashing these checks and making these withdrawals, Lawson pretended to be various bank account holders and forged their signatures on the checks and withdrawal slips.

21. Sandra Lawson presented the fraudulent identifications made by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” and personal and bank account information she received from Derrick Rooker when she asked the bank tellers to process the transactions.

22. By cashing the stolen, counterfeit, and otherwise unauthorized checks and making the unauthorized withdrawals in other people’s names, Sandra Lawson stole and attempted to steal approximately \$98,300 from Citizens Bank, \$44,388.60 from Commerce Bank, \$257,984.24 from Wachovia Bank, \$49,041.67 from PNC Bank, \$48,000 from First Trust Bank, and \$17,950.85 from Sovereign Bank.

23. After each fraudulent transaction, Sandra Lawson gave the proceeds to Derrick Rooker or the individual Rooker designated.

24. In or about May 2004, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” manufactured a fraudulent Pennsylvania driver’s license that contained the photo of Sandra Lawson and the name, address, and date of birth of true Wachovia Bank customer K.E.

25. In or about May 2004, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” provided to Kasimu Clark the fraudulent Pennsylvania driver’s license he had created with Sandra Lawson’s photo and K.E.’s personal identifying information.

26. In or about May 2004, Kasimu Clark provided to Derrick Rooker, Stanley Young, or another driver the fraudulent Pennsylvania driver’s license created by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” with Sandra Lawson’s photo and K.E.’s personal identifying information, as well as two **stolen, counterfeit, and otherwise unauthorized checks** made out to K.E.

On or about the following dates, Sandra Lawson went to the following Wachovia Bank branches, where she cashed and attempted to cash one of the **stolen, counterfeit, and otherwise unauthorized checks** made out to K.E. and made and attempted to make unauthorized withdrawals from K.E.’s account:

Overt Act	Date	Bank Location	Face Amount of Check or Withdrawal Slip/ Counter Check
27	5/13/2004	Warminster, PA	\$4,445.07 check
28	5/13/2004	Warminster, PA	\$4,000.00 withdrawal
29	5/14/2004	Hatboro, PA	\$4,445.07 check
30	5/14/2004	Hatboro, PA	\$4,000.00 withdrawal
31	5/15/2004	Warminster, PA	\$3,500.00 withdrawal
32	5/15/2004	Warminster, PA	\$3,500.00 withdrawal

### **Transactions by James Butler**

33. With the means of identification made by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” and provided to James Butler by Derrick Rooker, Butler pretended to be other people in order to cash stolen, counterfeit, and otherwise unauthorized checks and to make unauthorized withdrawals at Citizens Bank, Wachovia Bank, PNC Bank, Univest Bank, and Sovereign Bank.

34. From on or about March 6, 2004, through on or about March 6, 2005, at the direction of Derrick Rooker, James Butler presented approximately 33 stolen, counterfeit, and otherwise unauthorized checks and approximately 2 unauthorized withdrawal slips at Citizens Bank, Wachovia Bank, PNC Bank, Univest Bank, and Sovereign Bank. When cashing these checks and making these withdrawals, Butler pretended to be various bank account holders and forged their signatures on the checks and withdrawal slips.

35. James Butler presented the fraudulent identifications made by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” and personal and bank account information he received from Derrick Rooker when he asked the bank tellers to process the transactions.

36. By cashing the stolen, counterfeit, and otherwise unauthorized checks and making the unauthorized withdrawals in other people’s names, James Butler stole and attempted to steal approximately \$27,533.55 from Citizens Bank, \$13,000 from Wachovia Bank, \$57,761.65 from PNC Bank, \$51,438.98 from Univest Bank, and \$3,311.12 from Sovereign Bank.

37. After each fraudulent transaction, James Butler gave the proceeds to Derrick Rooker or the individual Rooker designated.

38. In or about May 2004, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” manufactured a fraudulent Pennsylvania driver’s license that contained the photo of James Butler and the name, address, and date of birth of true Citizens Bank customer A.R.

39. In or about May 2004, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” provided to Kasimu Clark the fraudulent Pennsylvania driver’s license he had created with James Butler’s photo and A.R.’s personal identifying information.

40. In or about May 2004, Kasimu Clark provided to Derrick Rooker, Stanley Young, or another driver the fraudulent Pennsylvania driver’s license created by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” with James Butler’s photo and A.R.’s personal identifying information, as well as eight stolen, counterfeit, and otherwise unauthorized checks made out to A.R.

On or about the following dates, James Butler went to the following Citizens Bank branches, where he cashed and attempted to cash one of the stolen, counterfeit, and otherwise unauthorized checks made out to A.R.:

Overt Act	Date	Bank Location	Face Amount of Check
41	5/13/2004	Glenside, PA	\$2,492.37
42	5/13/2004	Horsham, PA	\$2,492.37
43	5/13/2004	Horsham, PA	\$4,000.00
44	5/14/2004	Southampton, PA	\$4,000.00
45	5/14/2004	Southampton, PA	\$4,200.00
46	5/15/2004	Warminster, PA	\$1,500.00
47	5/15/2004	Warminster, PA	\$2,169.26
48	5/16/2004	Philadelphia, PA	\$2,169.26

49. In or about January 2005, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” manufactured a fraudulent identification that contained the photo of James Butler and the name, address, and date of birth of true PNC Bank customer J.C.

50. In or about January 2005, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” provided to Kasimu Clark the fraudulent identification he had created with James Butler’s photo and J.C.’s personal identifying information.

51. In or about January 2005, Kasimu Clark provided to Derrick Rooker, Stanley Young, or another driver the fraudulent identification created by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” with James Butler’s photo and J.C.’s personal identifying information, as well as seven **stolen, counterfeit, and otherwise unauthorized checks** made out to J.C.

On or about the following dates, James Butler went to the following PNC Bank branches, where he cashed and attempted to cash one of the **stolen, counterfeit, and otherwise unauthorized checks** made out to J.C.:

Overt Act	Date	Bank Location	Face Amount of Check
52	1/28/2005	Conshohocken, PA	\$4,172.33
53	1/28/2005	Audubon, PA	\$4,172.33
54	1/28/2005	Norristown, PA	\$9,500.00
55	1/31/2005	Norristown, PA	\$9,500.00
56	1/31/2005	Jenkintown, PA	\$4,172.33
57	1/31/2005	Glenside, PA	\$4,172.33
58	1/31/2005	Abington, PA	\$4,172.33

### **Transactions by Robert Liszewski**

59. With the means of identification made by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” and provided to Robert Liszewski by Derrick Rooker, Liszewski pretended to be other people in order to cash stolen, counterfeit, and otherwise unauthorized checks and to make unauthorized withdrawals at Citizens Bank, Wachovia Bank, and Sovereign Bank.

60. From on or about November 20, 2003, through on or about April 2, 2004, at the direction of Derrick Rooker, Robert Liszewski presented approximately 23 stolen, counterfeit, and otherwise unauthorized checks and approximately 3 unauthorized withdrawal slips at Citizens Bank, Wachovia Bank, and Sovereign Bank. When cashing these checks and making these withdrawals, Liszewski pretended to be various bank account holders and forged their signatures on the checks and withdrawal slips.

61. Robert Liszewski presented the fraudulent identifications made by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” and personal and bank account information he received from Derrick Rooker when he asked the bank tellers to process the transactions.

62. By cashing the stolen, counterfeit, and otherwise unauthorized checks and making the unauthorized withdrawals in other people’s names, Robert Liszewski stole and attempted to steal approximately \$79,215.68 from Citizens Bank, \$8,000 from Wachovia Bank, and \$16,000 from Sovereign Bank.

63. After each fraudulent transaction, Robert Liszewski gave the proceeds to Derrick Rooker or the individual Rooker designated.

64. In or about March 2004, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” manufactured a fraudulent identification that contained the photo of Robert Liszewski and the name, address, and date of birth of true Citizens Bank customer J.W.

65. In or about March 2004, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” provided to Kasimu Clark the fraudulent identification he had created with Robert Liszewski’s photo and J.W.’s personal identifying information.

66. In or about March 2004, Kasimu Clark provided to Derrick Rooker, Stanley Young, or another driver the fraudulent identification created by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” with Robert Liszewski’s photo and J.W.’s personal identifying information, as well as one stolen, counterfeit, and otherwise unauthorized check made out to J.W.

67. On or about March 25, 2004, Robert Liszewski went to a Citizens Bank branch located in Broomall, Pennsylvania, where Liszewski cashed and attempted to cash a fraudulent counter check made out from the account of J.W. in the amount of \$4,000.

#### **Transactions by Kelly Bauldree**

68. With the means of identification made by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” and provided to Kelly Bauldree by Derrick Rooker, Bauldree pretended to be other people in order to cash stolen, counterfeit, and otherwise unauthorized checks and to make unauthorized withdrawals at Citizens Bank, Commerce Bank, and Wachovia Bank.

69. From on or about December 17, 2003, through on or about September 5, 2004, at the direction of Derrick Rooker, Kelly Bauldree presented approximately 14 stolen, counterfeit, and otherwise unauthorized checks and approximately 4 unauthorized withdrawal



slips at Citizens Bank, Commerce Bank, and Wachovia Bank. When cashing these checks and making these withdrawals, Bauldree pretended to be various bank account holders and forged their signatures on the checks and withdrawal slips.

70. Kelly Bauldree presented the fraudulent identifications made by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” and personal and bank account information she received from Derrick Rooker when she asked the bank tellers to process the transactions.

71. By cashing the stolen, counterfeit, and otherwise unauthorized checks and making the unauthorized withdrawals in other people’s names, Kelly Bauldree stole and attempted to steal approximately \$46,800 from Citizens Bank, \$18,250.14 from Commerce Bank, and \$7,500 from Wachovia Bank.

72. After each fraudulent transaction, Kelly Bauldree gave the proceeds to Derrick Rooker or the individual Rooker designated.

73. In or about May 2004, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” manufactured a fraudulent Pennsylvania driver’s license that contained the photo of Kelly Bauldree and the name, address, and date of birth of true Citizens Bank customer D.I.

74. In or about May 2004, defendant GEORGE THOMAS, a/k/a “George Thomas, El,” provided to Kasimu Clark the fraudulent Pennsylvania driver’s license he had created with Kelly Bauldree’s photo and D.I.’s personal identifying information.

75. In or about May 2004, Kasimu Clark provided to Derrick Rooker, Stanley Young, or another driver the fraudulent Pennsylvania driver’s license created by defendant GEORGE THOMAS, a/k/a “George Thomas, El,” with Kelly Bauldree’s photo and D.I.’s personal identifying information, as well as three **stolen, counterfeit, and otherwise unauthorized checks** made out to D.I.

On or about the following dates, Kelly Bauldree went to the following Citizens Bank branches, where she cashed and attempted to cash one of the **stolen, counterfeit, and otherwise unauthorized checks** made out to D.I. and made and attempted to make unauthorized withdrawals from D.I.'s account:

Overt Act	Date	Bank Location	Face Amount of Check or Withdrawal Slip/ Counter Check
76	5/4/2004	West Chester, PA	\$4,500.00 check
77	5/5/2004	West Chester, PA	\$6,500.00 check
78	5/5/2004	West Chester, PA	\$3,000.00 counter check
79	5/6/2004	West Chester, PA	\$5,000.00 check

All in violation of Title 18, United States Code, Section 371.

**COUNTS TWO THROUGH TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 3 through 26, and Overt Acts 1 through 79 of Count One are incorporated here.
2. On or about the following dates, in the Eastern District of Pennsylvania, and elsewhere, defendant

**GEORGE THOMAS,  
a/k/a “George Thomas, El,”**

knowingly and without lawful authority possessed, transferred, and used, and aided and abetted the possession, transfer, and use of, a means of identification of another person, that is, the name, address, date of birth, and social security number of bank customers, identified below, during and in relation to a bank fraud, each transaction constituting a separate count:

<b>COUNT</b>	<b>Person Falsely Presenting Identification</b>	<b>Date</b>	<b>Bank and Location</b>	<b>True Bank Customer</b>
2	George Taylor	9/2/2004	Citizens Bank Marlton, NJ	F.M.
3	George Taylor	9/2/2004	Citizens Bank Marlton, NJ	F.M.
4	George Taylor	9/2/2004	Citizens Bank Glenside, PA	F.M.
5	George Taylor	9/3/2004	Citizens Bank Horsham, PA	F.M.
6	James Butler	1/28/2005	PNC Bank Conshohocken, PA	J.C.
7	James Butler	1/28/2005	PNC Bank Audubon, PA	J.C.
8	James Butler	1/28/2005	PNC Bank Norristown, PA	J.C.

<b>COUNT</b>	<b>Person Falsely Presenting Identification</b>	<b>Date</b>	<b>Bank and Location</b>	<b>True Bank Customer</b>
9	James Butler	1/28/2005	PNC Bank Norristown, PA	J.C.
10	James Butler	1/31/2005	PNC Bank Jenkintown, PA	J.C.
11	James Butler	1/31/2005	PNC Bank Glenside, PA	J.C.
12	James Butler	1/31/2005	PNC Bank Abington, PA	J.C.

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

### **COUNT THIRTEEN**

#### **THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraph 1(a) of Count One is incorporated here.

2. From on or about October 3, 2003, to on or about December 11, 2003, in the Eastern District of Pennsylvania and elsewhere, defendant

**GEORGE THOMAS,  
a/k/a “George Thomas, El,”**

knowingly executed and attempted to execute a scheme to defraud Citizens Bank and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

#### **THE SCHEME**

3. It was part of the scheme that GEORGE THOMAS, a/k/a “George Thomas, El,” pretended to be other people in order to cash stolen, counterfeit, and otherwise unauthorized checks at Citizens Bank. He presented the checks and fraudulent identifications which identified him as the payees on the checks or the account holders for the accounts on which the checks were drawn and then asked the bank to cash the checks.

It was further a part of the scheme that:

4. By cashing the stolen, counterfeit, and otherwise unauthorized checks in other people’s names, GEORGE THOMAS, a/k/a “George Thomas, El,” stole and attempted to steal approximately \$74,632.07 from Citizens Bank.

5. GEORGE THOMAS, a/k/a “George Thomas, El,” obtained fake state identifications containing his photo and the names of true Citizens Bank customers to use as

identification. In some instances, defendant THOMAS then presented this fake identification to Citizens Bank along with a check payable to the name on the fraudulent identification. In other instances, he obtained a counter check from Citizens Bank payable from the account of the person whose name was on the fraudulent identification. Defendant THOMAS then fraudulently endorsed the checks with the names of the true bank customers and received cash from the bank. Each of the checks listed below was cashed in this manner:

<b>DATE</b>	<b>CHECK NO.</b>	<b>PURPORTED CHECK MAKER</b>	<b>CHECK PAYEE</b>	<b>STATE OF FRAUDULENT ID</b>	<b>AMOUNT</b>
10/3/2003	1753929992	“Wordsworth Academy”	J.D.	New Jersey	\$961.32
10/3/2003	1753929899	“Wordsworth Academy”	J.D.	New Jersey	\$865.30
10/3/2003	1753929892	“Wordsworth Academy”	J.D.	New Jersey	\$832.49
10/3/2003	1763950699	“Wordsworth Academy”	J.D.	New Jersey	\$951.63
10/3/2003	1753929992	“Wordsworth Academy”	J.D.	New Jersey	\$965.32
10/3/2003	1753959899	“Wordsworth Academy”	J.D.	New Jersey	\$925.14
10/22/2003	1918999863	“Greenwich Services Inc.”	M.J.	Pennsylvania	\$2,204.37
10/22/2003	1758999863	“Greenwich Services Inc.”	M.J.	Pennsylvania	\$2,305.19
10/22/2003	1718999863	“Greenwich Services Inc.”	M.J.	Pennsylvania	\$2,219.53
10/22/2003	1718999863	“Greenwich Services Inc.”	M.J.	Pennsylvania	\$2,219.53
10/22/2003	1718999862	“Greenwich Services Inc.”	M.J.	Pennsylvania	\$1,390.49
10/25/2003	928	“F.A.”	T.W.	Pennsylvania	\$1,452.00

<b>DATE</b>	<b>CHECK NO.</b>	<b>PURPORTED CHECK MAKER</b>	<b>CHECK PAYEE</b>	<b>STATE OF FRAUDULENT ID</b>	<b>AMOUNT</b>
10/25/2003	108	"S.R."	T.W.	Pennsylvania	\$4,120.52
10/29/2003	925999	"Precision Communication, Inc."	T.W.	Pennsylvania	\$1,280.53
11/13/2003	99958999877	"The Vanguard Group"	R.L.	Pennsylvania	\$2,308.40
11/13/2003	99958999879	"The Vanguard Group"	R.L.	Pennsylvania	\$2,214.36
11/13/2003	99958999875	"The Vanguard Group"	R.L.	Pennsylvania	\$2,304.39
11/13/2003	99958999889	"The Vanguard Group"	R.L.	Pennsylvania	\$2,216.38
11/13/2003	99958999874	"The Vanguard Group"	R.L.	Pennsylvania	\$2,236.44
11/13/2003	99958999878	"The Vanguard Group"	R.L.	Pennsylvania	\$2,213.34
11/13/2003	99958999899	"The Vanguard Group"	R.L.	Pennsylvania	\$2,316.48
11/13/2003	99858999899	"The Vanguard Group"	R.L.	Pennsylvania	\$2,302.54
11/13/2003	99868999899	"The Vanguard Group"	R.L.	Pennsylvania	\$2,246.53
11/13/2003	99878999899	"The Vanguard Group"	R.L.	Pennsylvania	\$2,238.60
11/16/2003	199881999894	"The Vanguard Group"	R.L.	Pennsylvania	\$1,814.60
11/16/2003	199881999895	"The Vanguard Group"	R.L.	Pennsylvania	\$1,830.60
11/16/2003	counter check	R.L.	"cash"	Pennsylvania	\$2,000.00
11/16/2003	counter check	R.L.	R.L.	Pennsylvania	\$3,000.00
11/16/2003	counter check	R.L.	R.L.	Pennsylvania	\$5,000.00
11/16/2003	122	"S.R."	R.L.	Pennsylvania	\$4,000.00

<b>DATE</b>	<b>CHECK NO.</b>	<b>PURPORTED CHECK MAKER</b>	<b>CHECK PAYEE</b>	<b>STATE OF FRAUDULENT ID</b>	<b>AMOUNT</b>
12/11/2003	counter check	J.H.	"cash"	Pennsylvania	\$5,000.00
12/11/2003	9878999899	"Bartash Printing Inc."	J.H.	Pennsylvania	\$2,234.19
12/11/2003	9883999899	"Bartash Printing Inc."	J.H.	Pennsylvania	\$2,231.43
12/11/2003	9889999899	"Bartash Printing Inc."	J.H.	Pennsylvania	\$2,230.43

All in violation of Title 18, United States Code, Section 1344.



## **COUNT FOURTEEN**

### **THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraph 1(g) of Count One is incorporated here.
2. From on or about November 7, 2003, to on or about April 27, 2004, in the

Eastern District of Pennsylvania and elsewhere, defendant

**GEORGE THOMAS,  
a/k/a “George Thomas, El,”**

knowingly attempted to execute a scheme to defraud Sovereign Bank and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

### **THE SCHEME**

3. It was part of the scheme that GEORGE THOMAS, a/k/a “George Thomas, El,” opened a Sovereign Bank account under the false name of “E.J.,” by using a false identification in the name of “E.J.” so that he could deposit stolen, counterfeit, and otherwise unauthorized checks into the account and then gain access to cash.

It was further a part of the scheme that:

4. By cashing the stolen, counterfeit, and otherwise unauthorized checks in other people’s names, GEORGE THOMAS, a/k/a “George Thomas, El,” stole and attempted to steal approximately \$8,729.92 from Sovereign Bank.

5. GEORGE THOMAS, a/k/a “George Thomas, El,” obtained a fake identification, that is, Pennsylvania driver’s license ending in 3094, in the name of E.J. in order to facilitate his crime. He then presented this fake identification to Sovereign Bank on or about

November 7, 2003, in order to fraudulently open a Sovereign Bank account ending in 4264 in the name of E.J.

6. On or about April 26, 2004, GEORGE THOMAS, a/k/a “George Thomas, El,” fraudulently deposited at a Sovereign Bank ATM machine in Philadelphia, Pennsylvania, counterfeit check # 2416, which purported to be payable from “SCC Restaurant LLC, DBA: Moshulu” to “E.J.,” in the amount of \$4,468.10, which bore the false endorsement of “E.J.”

7. On or about April 27, 2004, GEORGE THOMAS, a/k/a “George Thomas, El,” fraudulently deposited at a Sovereign Bank ATM machine in Yeadon, Pennsylvania, counterfeit check # 2416, which purported to be payable from “SCC Restaurant LLC, DBA: Moshulu” to “E.J.,” in the amount of \$4,261.87, which bore the false endorsement of “E.J.”

All in violation of Title 18, United States Code, Section 1344.

**COUNT FIFTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about July 18, 2005, and continuing to on or about October 16, 2008,  
in the Eastern District of Pennsylvania, the defendant

**GEORGE THOMAS,  
a/k/a “George Thomas, El,”**

having been arrested on felony charges punishable by imprisonment for a term of 5 years or more, and in connection with those charges, having been released pursuant to chapter 207 of Title 18, United States Code, did knowingly fail to appear before a court as required by the conditions of release, that is, failed to appear for trial on July 18, 2005, as required.

In violation of Title 18, United States Code, Section 3146(a)(1) and (b)(A)(ii).

## **NOTICE OF FORFEITURE**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 371, 1344 and 2, set forth in Counts One, Thirteen, and Fourteen of this indictment, defendant

**GEORGE THOMAS,  
a/k/a “George Thomas, El,”**

shall forfeiture to the United States of America any property that constitutes, or is derived from, proceeds traceable to the commission of such offenses, as charged in this indictment, including, but not limited to, the sum of \$1,289,814.50.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Sections 928(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 982(a)(2).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**LAURIE MAGID  
UNITED STATES ATTORNEY**